

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-06700095-2013**  
Application Received: **March 22, 2013**  
Plant Identification Number: **067-00095**  
Permittee: **JELD-WEN, Inc. D.B.A. JELD-WEN**  
Facility Name: **JELD-WEN, Wood Fiber Division**  
Mailing Address: **Post Office Box 1769, Craigsville, WV 26205**

*Revised: N/A*

---

Physical Location:	Craigsville, Nicholas County, West Virginia
UTM Coordinates:	529.8 km Easting • 4243.8 km Northing • Zone 17
Directions:	From Rt. 19 North of Summersville, take Rt. 41 North to Rt. 55 East, facility is approximately five miles and on the left.

---

### Facility Description

The Wood Fiber Division – West Virginia facility operates under the primary SIC Code 2493 and the secondary SIC Code 2851. The facility manufactures door skins in a process similar to the hardboard manufacturing process. The fiber-containing material, or furnish, consists of green poplar chips. The furnish is mechanically separated into fiber by the refiner and is then dried in a tube dryer. Next, the fiber is blended with a “no added formaldehyde” resin, and a fiber mat is formed. The mat continues into a cold pre-compressor, which is followed by trimming operations. The mat is then consolidated in a steam-heated press. After the press, the door skins are cut to the final dimensions and painted with waterborne primer.

A wood-fired boiler burns residuals from the production process, as well as purchased hogged-fuel, to generate steam. Additional combustion sources include a natural gas-fired back-up boiler and natural gas heated ovens associated with the priming operations. The fiber dryer is heated by both steam and natural gas (direct-fired).

This renewal also incorporates the permit application R30-06700095-2008 (SM03). This modification was required to continue exhausting the Rotary Valve (RV) to the atmosphere rather than the Biofilter (BF).

High moisture levels in the rotary valve exhaust were found to cause serious plugging and process problems in upstream particulate control devices at another JELD-WEN facility.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2012 Actual Emissions</b>
Carbon Monoxide (CO)	101.7	31.6
Nitrogen Oxides (NO <sub>x</sub> )	166.5	45.0
Particulate Matter (PM <sub>2.5</sub> )	<sup>1</sup>	<sup>1</sup>
Particulate Matter (PM <sub>10</sub> )	23.9	<sup>1</sup>
Total Particulate Matter (TSP)	41.2	28.6
Sulfur Dioxide (SO <sub>2</sub> )	6.3	0.2
Volatile Organic Compounds (VOC)	143.9	82.7

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2012 Actual Emissions</b>
Acetaldehyde	2.2	1.4
Acrolein	2.6	1.5
Benzene	1.1	0.5
Formaldehyde	2.6	3.5 <sup>2</sup>
Hydrogen Chloride	4.7	2.2
Methanol	3.8	18.1 <sup>2</sup>
Phenol	4.7	3.0
Propionaldehyde	1.4	0.9
Styrene	0.6	0.2
Other HAPs	3.9	1.2
Total HAPs	27.6	32.8 <sup>2</sup>

*Some of the above HAPs may be counted as PM or VOCs.*

<sup>1</sup>*Information not available.*

<sup>2</sup>*Some 2012 Actual Emissions are higher than Potential Emissions because potential emissions were reduced by permitting actions during 2012*

This facility does not have the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO<sub>2</sub>e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

## Title V Program Applicability Basis

This facility has the potential to emit 101.7 TPY of CO, 166.5 TPY of NO<sub>x</sub>, 143.9 TPY of VOCs, and 27.6 TPY of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 25 tons per year of aggregate HAPs, JELD-WEN is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
	45CSR10	To Prevent And Control Air Pollution From The Emission Of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits
	45CSR16	Standards of Performance For New Stationary Sources Pursuant To 40 CFR Part 60
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards For Hazardous Air Pollutants
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
	40 C.F.R. Part 63, Subpart QQQQ	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products
	40 C.F.R. Part 63, Subpart HHHHH	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2192P	August 13, 2013	
Civil Action No: 11-453 ST	August 4, 2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

This is a second renewal Title V permit. The Title V permit language changes made since the previous Title V permitting action for this facility are as follows:

- The emission units table was updated. Specifically, the Rotary Valve emission unit was removed from emission point E18.
- The rotary valve and its associated emissions were removed from condition 5.1.6.
- The rotary valve and its associated emissions were removed from emission point E18 and given its own emission point, E16, in conditions 5.1.7, 5.1.9, and 5.1.10.
- Condition 5.1.8 was changed since the MACT only requires a 90% reduction efficiency for Methanol OR Formaldehyde, not both.
- Condition 5.1.13 was added to include PM emission limits for the new emission point, E16.
- CAM language addressing proper maintenance, continued operation, and documentation of need for improved monitoring was added as conditions 5.2.9-5.2.11.
- "Reserved" conditions were removed causing all remaining permit conditions to be renumbered.
- Emission points E14a and E14b are now referred to as E14.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Greenhouse Gas Tailoring Rule: There have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM) – The permittee has previously submitted CAM plans in accordance with the CAM rule. The changes made with this renewal do not affect the CAM plans.

### Request for Variances or Alternatives

None.

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

**Comment Period**

Beginning Date: August 29, 2013  
Ending Date: September 30, 2013

**Point of Contact**

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478  
[Rex.E.Compston@wv.gov](mailto:Rex.E.Compston@wv.gov)

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Response to Comments (Statement of Basis)**

Not applicable.